

ELWIN COOPER DIVISION

156739

INTER-OFFICE

To H.F. MASON ADDRESS
FROM J.L. SPARKS ADDRESS
SUBJECT SITE VISIT BY DAN HOPKINS OF THE FEDERAL E.P.A. DATE August 29, 1984

On August 23, 1984, Dan Hopkins arrived at the plant to inspect the 268 construction area and the Northwest portion of the plant which was previously covered with plastic.

Mr. Hopkins, wearing his disposable shoe covers, was escorted to the 268 construction site area and the back portion of the plant. During the tour he had no negative comments and, in fact, indicated that we appeared to have done an excellent job in covering the back portion of the plant and completing the construction work in the 268 area.

Following the plant tour, Mr. Hopkins had several comments which follow:

The first item discussed was the 7,000 gallons of water presently stored in the tank in Unit 268. I indicated to Dan that we would be sampling the water and having the analysis completed very soon. Dan then indicated that even if no Dioxin is found in the water, it is Washington's feeling that we would still be required to filter out the soil and following the filtration, again, sample and analyze the water. I indicated to Dan that this was totally unacceptable and without just cause. I basically explained the procedures which would be used, mainly that the water would be agitated thoroughly before the sample is taken and as a result the analysis would include any Dioxin present whether it were in the water or attached to the small amount of soil that may be dispersed in the water. We were unable to resolve this issue.

Dan's remaining comments were related to the information submitted in response to the Order, more specifically, the R.I.F.S. information. His first comment was related to the number of core samples which would be taken. It was his feeling that we should take deep core samples in the two areas where Dioxin has been detected in levels in excess of 100 parts per billion. In addition, four, and possibly more, cores samples around the black tank area and an additional six cores around the Unit 268 area. He also felt that a composite of core samples should be taken from the back portion of the plant. Considerable discussion was given to why he felt this many samples were required when I felt two were more than sufficient. During the discussion it was revealed that for whatever reason, Mr. Hopkins had the

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opinion that the black tanks were partially underground tanks. I indicated this was not the case and showed him the concrete base on which the tanks were sitting. At this point, he seemed to change his mind and indicated that he would have to review the matter when he got back to his office.

The only other point in the R.I.F.S. information that he addressed was the section dealing with our determining the topographic conditions here at the facility. In our proposal we had indicated we would accomplish this by use of a 7.5 minute series map. Dan felt this would not be detailed enough and that we may have to complete our own aerial photography to accomplish the detailed topographic condition requested in the Order.

I indicated to Mr. Hopkins that I would appreciate if he could submit, in writing, an informal response to our R.I.F.S. further discussing his thoughts in these matters. He indicated that he would do this.

As additional information is received from Mr. Hopkins, I will forward same.


J.L. Sparks

JS:dlj
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